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**From:** Williamson, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1B1209CC553B4CBE9A59F3E47DC0A312-TRWILLIA]  
**Sent:** 8/14/2020 4:58:57 PM  
**To:** Cheatham, Tony [Cheatham.Tony@epa.gov]  
**CC:** Rexhepi, Doruntine [Rexhepi.Doruntine@epa.gov]  
**Subject:** FW: PFAS Importation Question

Hi Tony,

Doruntine has some questions about accessing CBI lan systems. Do you have someone that can work with her? Thanks.

Tracy

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**From:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>  
**Sent:** Wednesday, August 12, 2020 10:10 AM  
**To:** Williamson, Tracy <Williamson.Tracy@epa.gov>  
**Cc:** Pritts, Jesse <Pritts.Jesse@epa.gov>; Born, Tom <Born.Tom@epa.gov>  
**Subject:** RE: PFAS Importation Question

Hi Tracy,

Thanks so much for getting back to me, and sending us an update on that TSCA Inventory PFAS file.

It seems that the only thing we can look at the moment (virtually) are the PMNs on the Chemical Information System. However, when I sign into my CBI lan, I don't see an icon for that system – do I need special permission to acquire it? If so, could you point me to the right person to help me?

Susan Sharkey wasn't CC-ed on the last email, but should I need to reach out to her, I'll make sure to refer to this email.

Thanks,  
Doruntine

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**From:** Williamson, Tracy <Williamson.Tracy@epa.gov>  
**Sent:** Tuesday, August 11, 2020 4:34 PM  
**To:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>  
**Cc:** Pritts, Jesse <Pritts.Jesse@epa.gov>; Born, Tom <Born.Tom@epa.gov>  
**Subject:** RE: PFAS Importation Question

Hello,

Please find attached an updated non-CBI spreadsheet. There are four sheets:

- Non-CBI substances added to the original Inventory
- Non-CBI substances later added the Inventory via a PMN
- CBI substances added to the original Inventory
- CBI substances later added the Inventory via a PMN

Information on the spreadsheet is from the Inventory and is limited. Other information (e.g., submitters, import vs manufacture) would need to be obtained from the notice that resulted in the substance being put on the Inventory, i.e., original Inventory reporting notices or PMNs. CDR notices will have some of this information as well.

The original Inventory reporting notices (mostly from 1978) are in a CBI microfiche collection back at the office. More recent PMNs are can be found in OPPT's Chemical Information System on our CBI lan; older PMNs are in archives. I've cc'd Susan Sharkey from our Chemical Control Division who can answer questions that you may have on CDR (Susan is the program manager).

Tracy

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**From:** Rexhepi, Doruntine <[Rexhepi.Doruntine@epa.gov](mailto:Rexhepi.Doruntine@epa.gov)>  
**Sent:** Tuesday, August 11, 2020 3:21 PM  
**To:** Williamson, Tracy <[Williamson.Tracy@epa.gov](mailto:Williamson.Tracy@epa.gov)>  
**Cc:** Pritts, Jesse <[Pritts.Jesse@epa.gov](mailto:Pritts.Jesse@epa.gov)>; Born, Tom <[Born.Tom@epa.gov](mailto:Born.Tom@epa.gov)>  
**Subject:** RE: PFAS Importation Question

Hello Tracy,

I just wanted to touch base with you once again on a more friendlier note as I continue understanding the TSCA inventory and the data it pertains.

## Ex. 5 Deliberative Process (DP)

Please feel free to pass along my email to any one that can help me in answering these questions.

Many thanks,  
Doruntine

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**From:** Williamson, Tracy <[Williamson.Tracy@epa.gov](mailto:Williamson.Tracy@epa.gov)>  
**Sent:** Wednesday, April 22, 2020 9:25 PM  
**To:** Rexhepi, Doruntine <[Rexhepi.Doruntine@epa.gov](mailto:Rexhepi.Doruntine@epa.gov)>  
**Subject:** RE: PFAS Importation Question

Hello,

The list is just PFAS. If it were all fluorinated compounds, it would be quite a bit larger. It was compiled by identifying substances on the TSCA Inventory that meet a general OPPT working definition of PFAS.

Hope that helps.

Tracy

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**From:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>  
**Sent:** Wednesday, April 22, 2020 3:30 PM  
**To:** Williamson, Tracy <Williamson.Tracy@epa.gov>  
**Subject:** RE: PFAS Importation Question

Hi Tracy,

I was hoping you have an answer for me by the end of the day.

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**From:** Rexhepi, Doruntine  
**Sent:** Wednesday, April 22, 2020 10:13 AM  
**To:** Williamson, Tracy <Williamson.Tracy@epa.gov>; Born, Tom <Born.Tom@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>  
**Cc:** Steve Geil <steve.geil@erg.com>; Ryan Novak <Ryan.novak@erg.com>; Smith, ThomasA <smith.thomasa@epa.gov>  
**Subject:** RE: PFAS Importation Question

Hi Tracy,

Hope you and your family are safe and well.

The excel file you shared back in December, with a total of 1223 compounds (603 active compounds and 456 inactive compounds) - does that include all fluorinated compounds or just PFAS? How was the list compiled?

Many thanks,  
Doruntine

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**From:** Williamson, Tracy <Williamson.Tracy@epa.gov>  
**Sent:** Thursday, December 5, 2019 3:43 PM  
**To:** Born, Tom <Born.Tom@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>  
**Cc:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>; Steve Geil <steve.geil@erg.com>; Ryan Novak <Ryan.novak@erg.com>; Smith, ThomasA <smith.thomasa@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>  
**Subject:** RE: PFAS Importation Question

Some clarification ...

- TSCA section 13. TSCA requires that companies provide a TSCA compliance certification with chemical shipments into the US. Companies do not have to provide the chemical identities with shipments; they only have to certify (e.g., in CBP's ACE system, on invoices, and/or on other entry documentation) either that they are in compliance with TSCA or that TSCA does not apply. CBP is generally responsible for the implementing regulations on imports (apologies, its customs and I misspoke and said commerce), and CBP reviews the TSCA certifications that accompany shipments (but they will call us on occasion if they see something unusual and have a question). <https://www.epa.gov/tsca-import-export-requirements/tsca-requirements-importing-chemicals#tsca>.

- TSCA section 5. Notices submitted under section 5 are required for “new” chemicals that are not on the TSCA Inventory. Companies cannot commercialize a new chemical substance until after EPA review, so these notices are pre-commercial. Companies must, of course, provide specific chemical identities in their notices and indicate what kind of activity they *anticipate* engaging in – domestic manufacture, import, or both – if and when they do commercialize their substances after they clear EPA review. Once a chemical is on the Inventory, a company is not held to what it put in its section 5 notice regarding type of commercial activity, *unless the chemical’s commercial activity is regulated by us* (e.g., import only). Other companies also can commercialize the same chemical after its put on the Inventory; they also would be held to any existing regulation(s).
- TSCA section 8. CDR submissions are required to be filed every few years for a subset of “existing” chemicals on the Inventory (PV thresholds as Tony mentioned) that were in recent commerce (e.g., for the 2016 CDR cycle, companies reported their chemicals in commerce in 2012 through 2015). Companies must provide the type of activity that the recent commercialization was – domestic manufacture, import, or both – in addition to other information.

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**From:** Born, Tom <Born.Tom@epa.gov>

**Sent:** Thursday, December 5, 2019 1:47 PM

**To:** Krasnic, Toni <krasnic.toni@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>

**Cc:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>; Steve Geil <steve.geil@erg.com>; Ryan Novak <Ryan.novak@erg.com>; Smith, ThomasA <smith.thomasa@epa.gov>

**Subject:** RE: PFAS Importation Question

Hi Toni,

Thank you for your reply. I thought Tracy said that importation reporting is required under Department of Commerce TSCA regulations, and that companies are only required to report if they import a TSCA listed chemical, but not required to report the name of the chemical or the amount of the chemical imported. I’m looking for a source we can cite that states this.

Thanks,

Tom

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**From:** Krasnic, Toni <krasnic.toni@epa.gov>

**Sent:** Thursday, December 05, 2019 1:32 PM

**To:** Born, Tom <Born.Tom@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>

**Cc:** Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>; Steve Geil <steve.geil@erg.com>; Ryan Novak <Ryan.novak@erg.com>; Smith, ThomasA <smith.thomasa@epa.gov>

**Subject:** RE: PFAS Importation Question

Hi Tom,

I think this is a CDR question. Under CDR, companies are required to report (if they meet production volume thresholds, see [https://www.epa.gov/sites/production/files/2017-09/documents/cdr\\_basic\\_information-8.31.17-final.pdf](https://www.epa.gov/sites/production/files/2017-09/documents/cdr_basic_information-8.31.17-final.pdf)) the names and quantities of PFAS compounds but names and PVs may be claimed CBI. I’m cc’ing Tom Smith in case you have additional questions about CDR.

Thanks,

Toni Krasnic

Existing Chemicals Branch

EPA/OCSPP/OPPT/CCD/ECB

WJC East, 4134D | (202) 564-0984

**From:** Born, Tom <Born.Tom@epa.gov>  
**Sent:** Thursday, December 05, 2019 12:43 PM  
**To:** Williamson, Tracy <Williamson.Tracy@epa.gov>  
**Cc:** Krasnic, Toni <krasnic.toni@epa.gov>; Rexhepi, Doruntine <Rexhepi.Doruntine@epa.gov>; Steve Geil <steve.geil@erg.com>; Ryan Novak <Ryan.novak@erg.com>  
**Subject:** PFAS Importation Question

Hi Tracy,

Thank you again for giving us an overview of the TSCS inventory. In our final report we would like to c

**Ex. 5 Deliberative Process (DP)**

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Thanks,

Tom

Ph: (202) 566-1001  
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Analytical Methods: [www.epa.gov/cwa-methods](http://www.epa.gov/cwa-methods)